

1 small business customers. We have an agreement
2 with two RBOCs and provide services in five
3 states, the three Ameritech states that I
4 mentioned plus also with NYNEX in Massachusetts
5 and New York. We thought this was an opportunity
6 to describe some of our progress with OSSs in the
7 Ameritech region.

8 EXAMINER JAMES: Any questions for Mr.
9 Parrish?

10 MR. BERNS: Yes, MCI has some questions.

11 EXAMINER JAMES: MCI may proceed.

12 Cross-Examination

13 By Mr. Berns:

14 Q. Mr. Parrish, first of all, don't take this
15 question to be a facetious question but you didn't
16 appear here by subpoena, did you?

17 A. No, I did not.

18 Q. So do you have interconnection agreements with
19 Ameritech, for example? Do you have an
20 interconnection agreement with Ameritech?

21 A. We have agreements to provide resale services in
22 the three states that I mentioned with Ameritech.

23 Q. Are those agreements that were submitted for
24 approval to the state commissions there?

25 A. In each one of the states, yes.

1 Q. They're all resale agreements?

2 A. Yes, they are.

3 Q. They were all approved I assume?

4 A. Yes, they have been.

5 Q. Do you know, for example, in Illinois whether the
6 pricing of the services you're purchasing from
7 Ameritech, I assume you're reselling Ameritech
8 services for local?

9 A. For local, yes.

10 Q. Do you have any idea whether that is a service by
11 a service discount or whether it's priced at an
12 overall discount?

13 A. I'm not overly familiar with exact pricing. I'm
14 in the operations side of it. Those types of
15 questions we could get somebody to answer, but I'm
16 not overly familiar with the pricing per se.

17 Q. Well, let's back up then and take a little bit of
18 a look at your responsibilities. You just said
19 that you're operations, that's your primary
20 responsibility?

21 A. That is correct.

22 Q. How old of a company is USN?

23 A. USN Communications is about two years old in its
24 present form. We're a consolidation of some other
25 companies that have existed in the past. We've

1 been providing service in the New York area for
2 about -- since 1994 with a Centrex based service.
3 As far as local resale services, we've been in
4 operation actually providing service since August
5 of last year.

6 Q. Okay. So how long have you been at USN?

7 A. I worked there as a consultant for about six
8 months, and subsequently since then I've been a
9 full time employee, probably about 15 months all
10 together.

11 Q. And before USN, where were you employed?

12 A. Before USN I worked 12 years at Illinois Bell in a
13 number of different assignments and then five
14 years at Ameritech.

15 Q. So you're familiar with Ameritech's operations
16 then? Did you work at -- I'm sorry, did you work
17 at Illinois Bell in the operations side?

18 A. I worked at Illinois Bell in a number of jobs.
19 Operational support systems, engineering, outings
20 and line jobs, construction, also in some staff
21 positions on the network planning.

22 Q. You worked at Illinois Bell directly before you
23 either became a consultant or worked with USN?

24 A. No, I worked at Illinois Bell for 12 years, then I
25 moved to Ameritech. I worked at Ameritech

1 services and product development and then worked
2 in AIIS, Ameritech Information and Industry
3 Services for the last couple years.

4 Q. Prior to USN?

5 A. Right.

6 Q. In your letter you describe that you use the
7 Ameritech preordering functions for the CSR
8 request?

9 A. That is correct.

10 Q. Is that the only preorder functioning that you're
11 using on an electronic basis?

12 A. That's the only one we're using currently for
13 electronic basis, that's right.

14 Q. So how does USN request a due date, for example,
15 for installing service for a new customer, if not
16 via the electronic interface?

17 A. For a due date for customer what we do is send out
18 the order request to Ameritech. When we get the
19 reply back, that's the due date we provide to the
20 customer.

21 Q. So is that something that's accomplished by a
22 phone conversation or by a paper exchange?

23 A. Over 80 percent of our orders flow electronically
24 right now to Ameritech. The other about 20
25 percent are via paper and phone calls.

1 Q. So it's the order that flows electronically, is
2 that what you're speaking of?

3 A. Both. You start out with a CSR as those flow 100
4 percent electronically to Ameritech. You get into
5 the ordering process and about 80 percent, 85
6 percent of our orders flow electronically to
7 Ameritech right now.

8 Q. Have you done any evaluation about the degree to
9 which your orders drop to manual processes after
10 they reach Ameritech of the 80 percent that are
11 transmitted electronically?

12 A. No, we have not.

13 Q. Have you done any analysis about Ameritech's
14 ability to meet the scheduled due dates?

15 A. We get a report from Ameritech monthly which
16 outlines missed appointments, missed due dates and
17 also talks to some of the repair side of the
18 business. Probably the report that you were
19 looking at earlier. We get that feedback from
20 Ameritech, and we've gotten that for probably the
21 last three months.

22 Q. Do you have a ballpark estimate about Ameritech's
23 ability to meet the scheduled due dates?

24 A. We haven't had a problem with missed appointments
25 and missed due dates. I don't have those specific

1 numbers with me. I didn't come prepared to talk
2 about kind of the -- that side of the business
3 from an actual implementation standpoint. I can
4 get those numbers. I don't have them here.

5 Q. Do you think you could have them submitted
6 sometime this week?

7 A. If that's what's required, sure. The only thing,
8 only concern on my part would be some of the
9 information on those reports, as I mentioned,
10 we're a privately held company. And the volume of
11 orders and number of lines and that type of thing
12 I would consider proprietary. I would want to
13 white that information out. The result in
14 percentages I would be willing to share.

15 Q. At least the resulting percentages?

16 A. Right.

17 MR. BERNS: I would take it up with the
18 examiner whether the examiner would entertain a
19 delayed exhibit as described by Mr. Parrish.

20 EXAMINER JAMES: I would, but it can't
21 be very delayed. What sort of a schedule could
22 you provide that on?

23 THE WITNESS: We could provide that
24 information tomorrow morning.

25 EXAMINER JAMES: Are you going to be

1 here tomorrow morning?

2 THE WITNESS: I was planning to fax it.

3 EXAMINER JAMES: Fine. All right. This
4 will be Delayed Exhibit 11. Would you describe
5 that for me, please?

6 THE WITNESS: I'll provide the most
7 recent monthly report that shows the realized
8 operational indices from Ameritech. And those
9 describe provisioning as well as maintenance
10 areas. I assume Ameritech has no objection to
11 that.

12 MR. PAULSON: That would be faxed I
13 assume to the Hearing Examiner here at the
14 commission?

15 EXAMINER JAMES: Yes. We don't have
16 time to do it properly I don't think. That would
17 be fine.

18 (Exhibit 11 designated for delayed
19 receipt.)

20 EXAMINER JAMES: It's due before noon
21 tomorrow I would think. The next question is is
22 that going to be subject for cross-examination
23 requests that aren't going to be possible to
24 fulfill?

25 MS. MARSH: Is that an option? Clearly

1 we would like to cross-examine with the document
2 in front of us. It's obviously much more fruitful
3 to do it that way as opposed to guess what
4 information may or may not be on the document,
5 practically speaking.

6 EXAMINER JAMES: Certainly would. I
7 don't know if Mr. Parrish is available.

8 MS. MARSH: I don't know what our
9 options are.

10 EXAMINER JAMES: I assume you have to go
11 back to your office to produce this.

12 THE WITNESS: I had only planned to be
13 here part of today.

14 EXAMINER JAMES: If there are questions,
15 could we take them by phone? We can do phone
16 conferencing in here if that would satisfy people.

17 THE WITNESS: That would work from my
18 perspective.

19 MS. MARSH: That's fine with me. What I
20 would like to do when Mr. Berns is completed is to
21 ask Mr. Parrish some questions as to the contents
22 of the document and address some concerns that may
23 become obvious.

24 EXAMINER JAMES: Okay. You have Mr.
25 Parrish now. Do what you can.

(Discussion off the record.)

EXAMINER JAMES: Go back on the record.

While we were off the record we agreed that or Mr. Parrish agreed to provide by noon tomorrow by fax the most recent monthly report that he has on realized operational indices that has been given to him by Ameritech. And it's my understanding that if we have questions on that that we need to ask, that Mr. Parrish will make himself available for conference call that we can do it telephonically. You may proceed.

BY MR. BERNS:

Q. Mr. Parrish, has Ameritech provided you any data that compares your percentage of due dates met versus Ameritech's percentage of due dates met for equivalent -- its equivalent retail services?

A. Yes. In the report that we were just talking about, there is a line that relates to performance for USN Communication versus a line for all retail versus a line for the other wholesale companies. It's a report that was described a little bit earlier in here.

Q. Okay. Mr. Parrish, does USN use an electronic ordering interface to submit Centrex orders?

A. We're in the process of completing that

1 interface. We flow a very small percentage of
2 Centrex orders over electronically right now. I
3 would say 1 percent at the most. So it's a very
4 small portion of our total interface. And the
5 reason we don't send them all over is not so much
6 because the interface can't support them is we're
7 unclear as to how to write some of those orders
8 right now and specifically what USOCs need to be
9 associated. So it's not so much an interface
10 question as it is our understanding of Centrex as
11 a whole.

12 Q. Can you describe what kinds of information
13 Ameritech has been providing to you in terms of
14 the specifications necessary to submit a Centrex
15 order?

16 A. We've been meeting with them to try to understand
17 what USOCs and what FIDs, if you will, are
18 associated with Centrex and how to take an
19 existing grandfathered or existing Centrex
20 customer and relate that over to an ACS type of
21 customer, Ameritech Centrex Service type of
22 customer. And we're in the process of
23 understanding that right now.

24 Q. Have you ever had an opportunity to review
25 something called the Ameritech Resale Services

1 Guide, Wholesale Services Guide?

2 A. I have seen it. I have not reviewed it
3 personally.

4 Q. I realize you haven't personally reviewed that
5 document, but do you know whether that document
6 would contain specifications that would be
7 sufficient for a CLEC to be able to design their
8 own interface to order Centrex electronically?

9 A. No, I wouldn't. I wouldn't know that to be able
10 to comment intelligently on it.

11 Q. Do you know -- would you say as of today that
12 Ameritech has provided you with sufficient
13 information for you to be able to develop your
14 side of an ordering system that could order
15 Centrex electronically?

16 A. I believe that we have the sufficient electronic
17 interface to provide Centrex orders. What we
18 don't have is the service information that needs
19 to go into that interface in order to flow the
20 order properly.

21 Q. And that's true even today?

22 A. Right now it is, yes.

23 Q. How long has USN been using Ameritech's OSS
24 systems? I realize you haven't been using all of
25 the functions but could you give a brief timeline

1 as to when you began using them?

2 A. We began using the CSR interface when we started
3 launching service in August. We've been placing
4 orders gradually on an increasing basis using the
5 electronic interface from early in August when it
6 was entirely manual to where we are now where it's
7 over 80 percent electronic. We've been adding the
8 electronic capabilities based on training of our
9 people as well as the expansion of the interface
10 and its ability to support new services.

11 Q. On the ordering side would you characterize the
12 ordering system as fully operational and tested
13 today? Does it meet your needs today, USN's needs
14 today?

15 A. The system itself we believe meets our needs.
16 We've been using it in three states for providing
17 orders. For both the CSRs and the preordering
18 basis and ordering using the system interface for
19 placing actual live customer orders, we believe it
20 meets our needs, yes.

21 Q. Would you have said the same thing in August?

22 A. For the CSRs I believe I would say the same thing
23 back in August. As far as the system for
24 provisioning orders back in August, we didn't have
25 enough volume to really make an intelligent say

1 one way or the other in that time frame whether
2 the system was robust. I think now we have a
3 sufficient volume that we feel that the system is
4 robust to handle both the orders and the CSRs.

5 We had a very steep ramp-up period from
6 August of last year where we had a few orders.
7 Now we're processing hundreds and thousands each
8 week so that we've got a much better feel for the
9 systems.

10 Q. The early part of the ramp-up phase, I realize
11 we're talking about a narrow window of time all
12 together, did you experience any orders that you
13 had submitted electronically that were rejected
14 all the way back to USN?

15 A. I don't know of any personally, but I would assume
16 there were probably a few. But I don't have any
17 statistics on that.

18 MR. BERNS: Mr. Parrish, thank you very
19 much. That's all I have at this point.

20 EXAMINER JAMES: Other questions for Mr.
21 Parrish?

22 MS. MARSH: AT&T has some questions.

23 EXAMINER JAMES: Anyone else?

24 (No response.)

25 EXAMINER JAMES: Go ahead.

Cross-Examination

By Ms. Marsh:

Q. Good afternoon, Mr. Parrish.

A. Hello.

Q. My name is Joan Marsh, and I work for AT&T. A few questions. As to the preordering interface, as I understand it you are only using that for the purposes of accessing customer service records; is that correct?

A. That is correct.

Q. Can you tell me if USN service representatives are able to access customer service records from Ameritech while its customers are on the line?

A. We could probably do that. That's not our process though. The process that we use, we don't pull up CSRs live while we have a customer on the line. Our sales people either make a sale or talk to a customer and off time, not real-time basis, as far as the systems are concerned. So we pull the CSRs and provide that information to them. So it's a little bit different than what you were describing earlier.

Q. Is there any percentage of USN's orders where the CSRs are actually accessed while the customer is on the line?

1 A. I would say no.

2 Q. Do you have any data as to the average response
3 time from Ameritech as it relates to receipt of
4 CSR information after it's requested by USN?

5 A. I don't have statistical study. But it's probably
6 in the neighborhood of about 10 seconds to get a
7 CSR electronically.

8 Q. Do you have a report or any raw data or analysis
9 that supports that?

10 A. No, I don't.

11 Q. Does USN make any attempt to track that
12 information?

13 A. Not right now because it hasn't been a problem.

14 Q. What is the basis for your conclusion that you
15 just provided us?

16 A. We have about 30 people in the provisioning center
17 that actually provision orders and pull CSRs. My
18 comments are based on walking and talking with
19 them.

20 Q. Has Ameritech provided you with any analysis or
21 comparison of CSR response time for Ameritech
22 service representatives as compared to CSR
23 response time for USN service representatives?

24 A. No, they have not.

25 Q. Now, as I understand it USN participated in a

1 demonstration that took place in January; is that
2 correct?

3 A. Yes, it is.

4 Q. And during that demonstration I believe that there
5 was real-time access to a customer service record?

6 A. That is correct.

7 Q. But my understanding is that that is not part of
8 USN's business process to actually obtain
9 real-time access while a customer is on the line?

10 A. That's correct.

11 Q. Now, also at that demonstration in January I
12 believe there was a transaction where it was
13 demonstrated real-time receipt of a telephone
14 number; is that correct?

15 A. That is correct.

16 Q. Does USN currently rely on electronic interfaces
17 for receipt of a telephone number?

18 A. We currently don't require that process. Our
19 customers are primarily assumes, as is, so they
20 bring their existing telephone numbers with them.
21 We have the system capabilities in place to do
22 that. However, we don't have a need to do it
23 right now in the actual operating environment that
24 we're in.

25 Q. What percentage of USN orders are for new orders

- 1 or new lines?
- 2 A. Very small percentage, I would say maybe 5 percent
- 3 at the most.
- 4 Q. As it relates to those 5 percent of USN's orders,
- 5 does USN attempt to obtain a telephone number
- 6 while the customer is on the line?
- 7 A. Not while the customer is on the line, no.
- 8 Q. And why is USN not using that interfacing
- 9 real-time method?
- 10 A. Because our primary focus today is on turning up
- 11 an assuming customer. And we only have a very
- 12 small group that actually goes out and pulls those
- 13 telephone numbers. It's not worth training
- 14 everybody that interfaces with the customer on
- 15 that interface right now. Strictly an operations
- 16 issue.
- 17 Q. In your letter on page 2 you invited this
- 18 commission to review the video from the press
- 19 conference in January; is that correct?
- 20 A. That is correct.
- 21 Q. And you indicated that you participated in that
- 22 press conference and demonstrated USN's use of the
- 23 Ameritech interfaces; is that correct?
- 24 A. That is correct.
- 25 Q. But isn't it true that as it relates to the

1 demonstration of the telephone number interface at
2 that press conference, USN indeed is not currently
3 using the Ameritech interface in that fashion?

4 A. No, that's not a true statement. We're using
5 those interfaces. In no time in that video did we
6 have a customer on the line or were we talking
7 with a customer. The way we pulled the CSR and
8 telephone number in that video is the way we pull
9 them today operationally.

10 Q. Has Ameritech provided you with any data as it
11 relates to the response time for USN inquiry for a
12 telephone number from a USN service representative
13 as compared to an inquiry made by an Ameritech
14 service representative?

15 A. No, they have not.

16 Q. Did USN test the electronic interfaces as it
17 relates to receipt of a due date?

18 A. We get the due date information back on the order
19 itself. We utilize that interface today. As far
20 as test, we test it back prior to August, so yes,
21 we did test it.

22 Q. Does USN currently rely on that interface for
23 electronic receipt, real-time, of a due date for
24 an order?

25 A. Yes, we do.

1 Q. And is that done while the customer is on the
2 line?

3 A. No, it is not.

4 Q. And what is the average response time for receipt
5 of a due date?

6 A. You mean the time from sending the request to the
7 response until it comes back, I don't know. We
8 haven't measured that.

9 Q. Is there any data available to you at USN that
10 would reflect the average response time for
11 submission of an order as opposed to receipt of a
12 due date for installation?

13 A. We could perform a test, but we haven't done that.

14 Q. According to some testimony that Mr. Rogers
15 provided us, there was approximately 1600 USN
16 requests for service record, customer service
17 records in January, does that sound right?

18 A. It sounded low to me, but I don't have the number
19 with me right now.

20 Q. And also according to the data provided to us by
21 Ameritech in actuality there was less than 500
22 total orders placed in January. Can you explain
23 to me why there are so many more requests for
24 service customer records than there are actual
25 orders placed?

1 A. Yes. Very easily, in our process we pull a CSR
2 prior to placing an order with Ameritech to take a
3 look at what the customer has as far as services.
4 We then place the order. And when the order is
5 complete, we pull a post order CSR to make sure
6 that everything was actually installed the way it
7 should have been. That post CSR then becomes our
8 basis for our customer record for that customer.
9 So we would expect to see at least two to three
10 times as many CSRs as we do orders being placed.

11 Q. Makes sense. Does for each CSR that USN pulls,
12 does USN provide Ameritech with a letter of
13 authorization?

14 A. The two processes that Joe described earlier in
15 his testimony or whatever up here, the processes
16 that we utilize. For every CSR that we get prior
17 to a sale, we have to provide an LOAP. If we
18 place one without an LOAP, that means we have an
19 order, and they actually monitor that we have an
20 order that comes after a CSR within a four day
21 period of time I believe it is. Those are the
22 exact two processes that we're utilizing.

23 Q. For every order or CSR request by USN, one of
24 those would be true?

25 A. Yes.

1 Q. On the ordering interface I believe you told Mr.
2 Berns that you are unsure as to what percentage of
3 USN's orders are processed manually on the
4 Ameritech side of the interface; is that correct?

5 A. Right. I have no idea what Ameritech does with
6 the orders once they get over there. We place
7 them electronically.

8 Q. And what percentage of USN's orders are placed
9 electronically?

10 A. Over 80 percent right now.

11 Q. As to the 20 percent, can you explain to us why
12 those are not placed electronically?

13 A. A large percent of those are complex Centrex types
14 of orders. And as I mentioned, we haven't figured
15 out the total in which to place those orders,
16 enter them into the system right now. The system
17 will accept them, but we don't know how to place
18 them.

19 Q. What aspect about entering into Ameritech's system
20 is confusing to USN?

21 A. The large array of existing USOCs for existing
22 Centrex services and how they map to the existing
23 Centrex offerings that are available to Ameritech.

24 Q. Anything else?

25 A. That's the primary reason.

- 1 Q. And have you discussed these problems or these
2 confusions with Ameritech?
- 3 A. Yes.
- 4 Q. And do you know when you'll be able to resolve
5 those?
- 6 A. They're working with us on them now in order to
7 provide a mapping from grandfathered existing,
8 whatever, Centrex services to ACS types of
9 services. It should be within a couple weeks.
- 10 Q. But as you sit here today, those issues as it
11 relates to placing a Centrex order are not fully
12 resolved?
- 13 A. Not for placing an electronic order. We can place
14 them manually. We provide information manually,
15 here is what we want to do, and they actually work
16 it through on their side. We still can place the
17 orders. We just can't use the electronic
18 interface.
- 19 Q. How does USN process -- Strike that. Do you know
20 what an 860 is?
- 21 A. I know it's one of the responses or no, it's not,
22 no, the 850 and 860 are requests from us to
23 Ameritech. 865s and 855s are the replies. I
24 don't know the basis or information contained in
25 those documents or electronic formats.

- 1 Q. Let me ask you this. How does USN place a request
- 2 for a change to a purchase order?
- 3 A. I believe it's the 860, but I'm not sure.
- 4 Q. Is that placed electronically?
- 5 A. Yes, it is.
- 6 Q. And do you know if that's done on a complete
- 7 refresh basis?
- 8 A. No, I don't.
- 9 Q. Do you know if those are handled electronically or
- 10 manually on the Ameritech side of the interface?
- 11 A. No, I don't.
- 12 Q. Does USN receive an 865 when an order is
- 13 completed?
- 14 A. Yes, we do.
- 15 Q. Do you know if in any instance the 865 has been
- 16 received 24 hours after the order was completed or
- 17 later?
- 18 A. No, I don't have any statistics on the actual
- 19 timing of that.
- 20 Q. Is that something that USN would track, receipt of
- 21 865s?
- 22 A. Instead of tracking the 865s what we're taking a
- 23 look at is first traffic. What we do is we enter
- 24 into our systems the date Ameritech says they're
- 25 going to complete the order, then we watch for

1 traffic. If the traffic date is different from
2 the date they say completes, then we know we have
3 a problem.

4 What we're doing is tracking it that way
5 instead of relying on all the systems responses.
6 We're doing it on a more positive rather than just
7 a systems basis.

8 Q. If I understood your answer, you're tracking the
9 actual completion date as opposed to the promised
10 completion date?

11 A. No, we're tracking if Ameritech comes back and
12 says they're going to complete an order on 3/31,
13 we enter that in as the completion date. We look
14 and make sure we see traffic from that line on
15 4/1. If we do, we note the order was completed
16 and everything is kosher as far as we're
17 concerned.

18 If traffic does not start appearing, we
19 go back and take a look, and maybe they didn't
20 complete when they said or there was some other
21 problem. We go back.

22 Q. Do you know in what percentage of USN's orders
23 that inquiry, the look at traffic, does not match
24 up with the due date?

25 A. No, because we've just started that process.

1 Q. And when did you begin that process?

2 A. Last week is when we started that process.

3 Q. Now, you indicated that Ameritech is providing you
4 with a monthly report?

5 A. Right.

6 Q. How many monthly reports have you received?

7 A. We've -- let's see, we received one preliminary
8 report and then two full months after that.

9 Q. Can you tell me what categories of information are
10 provided to USN on that monthly report?

11 A. No. I'll provide that as part of the exhibit
12 tomorrow.

13 Q. In an effort not to have to call you up and ask
14 you additional cross-examination questions, if you
15 recollect, can you describe for me the categories
16 of information that are included on that report if
17 not the specific results?

18 A. There is two broad categories. They deal with
19 provisioning and then with the repair and
20 maintenance. On the provisioning side they talk
21 about missed appointments, due dates met, that
22 type of thing. On the repair side they talk about
23 out of service over 24 hours and length of time of
24 repairs and other statistics along that line.
25 There is approximately two pages of charts that